



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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June 21, 2005

Ref: 8EPR-N

Pamela Hutton
Regional Transportation Director
Colorado Department of Transportation, Region 6
2000 S. Holly St.
Denver, CO 80222

David Nicole
Division Administrator, Colorado Division
Federal Highway Administration
12300 W. Dakota Ave., Suite 180
Lakewood, CO 80228

Re: Valley Highway – Logan to 6th Ave.
DEIS Review 20050174

Dear Ms. Hutton and Mr. Nicole:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, Region 8 of the Environmental Protection Agency (EPA) has reviewed and rated the *Draft Environmental Impact Statement (DEIS) for the Valley Highway -- Logan to 6th Ave.*, dated April 2005. This DEIS includes the widening of I-25 in Denver, Colorado from Logan St. to 6th Ave. including changes to interchanges and arterials in the area such as Logan St., Broadway, Santa Fe, Kalamath, Alameda, 6th Ave. Bryant St. and Federal Blvd.

Based on the procedures EPA uses to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS, the project will be listed in the Federal Register in the category EC-2 (EC - Environmental Concerns, 2 - Insufficient Information). This rating means that the review identified environmental impacts that should be avoided in order to fully protect the environment and the DEIS does not contain sufficient information to thoroughly assess environmental impacts that should be avoided to fully protect the environment.

EPA's main issues are as follows: Further evaluation of opportunities to improve pedestrian access to commercial areas; the compatibility of ramp and arterial improvements with multimodal transportation development; bicycle and pedestrian safety at intersections; improvements to the air quality analysis. Our detailed comments are attached.

If you have any questions about these comments, please contact Robert Edgar at (303) 312-6669 or me at (303)312-6004. We appreciate your interest in our comments.

Sincerely,

Original signed by

Larry Svoboda, Director
NEPA Program
Ecosystem Protection and Remediation

Enclosure

cc: Chris Horn, FHWA
Tony Gross, CDOT

**EPA Region 8 Detailed Comments
Valley Highway Logan to 6th Ave. DEIS
June 2005**

Air Quality.

1. Page 4.5-4, Section 4.5.2.2: EPA has concerns about the very high estimated concentrations of carbon monoxide at the I-25/Alameda intersection. The hotspot model shows 7.3 ppm over 8 hours and the standard is 9 ppm. The 2003 estimated concentration is 11.3 ppm indicating that this location is currently a hotspot. CDOT should consider monitoring near the businesses (and/or if there are any residences) at this location or running the hotspot model using actual meteorological data to give more refined modeling results for this intersection.
2. Page 4.5-5, Section 4.5.2.3. EPA agrees with and is pleased to see that CDOT acknowledges the likely increase of particulate matter emissions resulting from increased (vehicle miles traveled) VMT.
3. Page 4.5-5, Section 4.5.2.3. The DEIS notes continued reductions in PM₁₀ from "updated street sanding procedures." EPA is not aware of any plans to change current street sanding and sweeping procedures that would result in additional decreases in PM₁₀. The FEIS should be revised to clarify this issue.
4. Page 4.5-5, Section 4.5.2.3. The DEIS indicates that one factor resulting in lower emissions or maintaining reduced emissions of PM₁₀ is the vehicle inspection and maintenance program. EPA understands that the State of Colorado is currently in the process of eliminating the program.
5. Page 4.5-6, Section 4.5.2.4. The last paragraph of this section states "the general trend of air toxics emissions is expected to decrease over time. . ." EPA suggests that the EIS show the results of emissions using MOBILE 6.2 mobile source air toxics (MSAT) emissions factors and VMT to verify that in fact the MSAT emissions will be decreasing in the future. If additional modeling is not done, EPA suggests that the supposition regarding trends be deleted. While it is likely that the rate of emissions will decrease, the decrease will occur over an extended time period and may be offset by a large increase in VMT.
6. Since air toxics impacts related to highways dissipate quickly with distance from the highway, the DEIS should assess receptors within short distance (600 feet) of the project area and then assess the general trend in emissions as indicated in my previous comment.

Multi-Modal Transportation Development, Pedestrian and Bicycle Safety

7. We recommend that the EIS look at some additional mitigation measures for bicycle and pedestrian safety and increasing the viability of alternative modes of transportation.

Currently, only the hardest commuter or those with no other option brave this corridor on foot or bicycle. Are there additional design practices that can be developed for calming or slowing traffic in pedestrian and bicycle crossing areas? Which intersection designs are safer for pedestrians and bicyclists? Are there different methods of programming traffic signals and installing traffic signs to protect pedestrians and bicyclists from turning vehicles? EPA is concerned about this issue because successful implementation of multi-modal development is one of the few ways to successfully reduce VMT and associated air pollution.

8. We are very pleased that the project has incorporated many components that will improve pedestrian and bicycle safety to a such as the proposed bicycle crossing at Bayaud Street, additional sidewalks and medians and islands in several areas that can be used as pedestrian refuges. However, there also some aspects of a typical highway design that will continue to make this area dangerous for pedestrians and bicyclists. The main problems will be vehicles traveling at high-speed, turning and merging into city traffic. For example, alternative 1 shows a "single-point urban interchange" at the intersection of Federal Boulevard and US 6. Although these types of intersections use less land, drivers find the multiple curved lanes crisscrossing to be confusing taking their attention away from crossing bicycles and pedestrians. Pedestrians and bicyclists experience many lanes of uncontrolled pavement (used by vehicles in more than one direction).
9. It appears that the rerouting of traffic from South Platte River Drive to Lipan St. will encourage truck traffic through the residential area on or near Lipan St. between Virginia and Mississippi Avenues. What measures will be in place to retain Jason St. as the truck route through this neighborhood?

Water Quality/Cumulative Impacts

10. Typically for highway projects, we anticipate a more quantitative analysis of water quality impacts (for example, modeling water quality using the Driscoll model). However in this case, the new storm water improvements associated with this project are reasonable mitigation in this area of extensive urban development. The amount of pavement/ impervious surfaces will be about the same for any alternative. There are also many other storm water discharges in this area of the South Platte including outfall from the T-Rex portion of I-25 and South Denver, which may have a much greater impact on the South Platte than this project.